

## **EXECUTIVE SUMMARY**

### **Final Report: South Carolina Child and Family Services Review**

This document presents the findings of the Child and Family Services Review (CFSR) for the State of South Carolina. The CFSR was conducted the week of June 23, 2003. The findings were derived from the following documents and data collection procedures:

- The Statewide Assessment, prepared by the State child welfare agency – the South Carolina Department of Social Services (DSS);
- The State Data Profile, prepared by the Children’s Bureau of the U.S. Department of Health and Human Services, which provides State child welfare data for the years 1999 through 2001;
- Reviews of 50 cases at three sites throughout the State;
- Interviews or focus groups (conducted at all three sites and at the State-level) with stakeholders including, but not limited to children, parents, foster parents, all levels of child welfare agency personnel, collaborating agency personnel, service providers, court personnel, and attorneys.

A key finding of the South Carolina CFSR is that the State is in substantial conformity with one of the seven outcomes and with five of the seven systemic factors. With regard to the outcomes, South Carolina achieved substantial conformity with Safety Outcome 1. That is, the results of the CFSR indicate that DSS responds to maltreatment reports in accordance with State-established timeframes and is effective in preventing maltreatment recurrence among children already known to the child welfare agency. The State’s percent of maltreatment recurrence in 2001 (3.4%), as indicated in the Statewide Data Profile, demonstrates that South Carolina meets the national standard for this measure.

The two weakest areas of State performance on the child welfare outcomes pertained to substantial conformity with Permanency Outcome 1 (Children have permanency and stability in their living situations.) and Well Being Outcome 1 (Families have enhanced capacity to provide for their children’s needs.). With regard to Permanency Outcome 1, cases in Marion County (57%) and cases in Lexington County (50%) were more likely to have substantially achieved this outcome than cases in Greenville County (27%). The case reviews and State data indicate that the DSS is not consistently effective in achieving finalized adoptions in a timely manner or in ensuring placement stability for children in foster care. In addition, although the State met the national standard for the percentage of reunifications occurring within 12 months of a child’s entry into foster care, the case reviews found that in a substantial percentage of the applicable cases reviewed, the DSS had not made diligent efforts to achieve the goal of reunification in a timely manner.

With regard to Well Being Outcome 1, all of the indicators for this outcome were determined to be in need of improvement. Although performance on this outcome was fairly low in all sites, cases in Marion County were more likely to be rated as having substantially

achieved this outcome (67%) than were cases in Lexington County (36%) or in Greenville County (29%). A key concern identified was that caseworkers were not visiting parents and children with sufficient frequency to ensure the child's safety and well-being and promote attainment of case goals.

The State was determined to be in substantial conformity with the systemic factors of Statewide Information System; Quality Assurance System; Training, Agency Responsiveness to the Community; and Foster and Adoptive Parent Licensing, Recruitment, and Retention. The State did not achieve substantial conformity with the systemic factors of Case Review System or Service Array. With respect to the systemic factor of Case Reviews, the CFSR found that the State was not convening permanency hearings in accordance with Federal requirements. Stakeholders noted that the court does not take responsibility for tracking permanency hearing requirements and the court does not automatically schedule children for future hearings at the time of a hearing or review. In addition, stakeholder interviews and case reviews revealed that parents are not being routinely involved in the case planning process; the CFSR case review process resulted in a rating of Area Needing Improvement for 53 percent of the cases.

The findings with regard to the State's performance on the safety and permanency outcomes are presented in table 1 at the end of the Executive Summary. Findings regarding well-being outcomes are presented in table 2. Table 3 presents the State's performance relative to the national standards, and table 4 provides information pertaining to the State's substantial conformity with the seven systemic factors assessed through the CFSR.

## **I. KEY FINDINGS RELATED TO OUTCOMES**

### **Safety Outcome 1: Children are first and foremost protected from abuse and neglect**

Safety Outcome 1 incorporates two indicators. One pertains to the timeliness of initiating a response to a child maltreatment report (item 1), and the other relates to the recurrence of substantiated or indicated maltreatment for the same children (item 2). South Carolina achieved substantial conformity for Safety Outcome 1. This determination was based on the following findings:

- The outcome was substantially achieved in 91.8 percent of the cases reviewed, which is greater than the 90 percent required for a rating of substantial conformity;
- The State met the national standard for the percentage of children experiencing more than one substantiated or indicated child maltreatment report within a 6-month period;
- The State met the national standard for the percentage of children maltreated while in foster care.

The case review findings and stakeholder comments indicate that DSS caseworkers are consistent in responding to maltreatment reports in accordance with the State's required timeframes. This is a particularly noteworthy finding because DSS requires that a response to high-risk reports must be initiated within 2 hours of receipt of the report (including establishing face-to-face contact with the child victim) and a response to moderate or low-risk reports must be initiated within 24 hours of receipt. Stakeholders noted that DSS provides 24-hour availability to receive maltreatment reports and that law enforcement and DSS work collaboratively in responding to reports.

Case reviews also found that repeat maltreatment, as it is measured for the CFSR (item 2), did not occur frequently. This is consistent with the State Data Profile indicating that South Carolina's incidence of maltreatment recurrence in FY 2001 was 3.4 percent, which meets the national standard for this measure of 6.1 percent or less.

### **Safety Outcome 2: Children are safely maintained in their homes when possible and appropriate**

Performance relevant to safety outcome 2 is assessed through 2 indicators. One indicator (item 3) addresses the issue of DSS' efforts to prevent children's removal from their homes by providing services to the families that ensure children's safety while they remain in their homes. The other indicator (item 4) pertains to DSS' effectiveness in reducing the risk of harm to the child.

South Carolina did not achieve substantial conformity with Safety Outcome 2. This determination was based on the finding that the outcome was substantially achieved in 71.4 percent of the cases reviewed, which does not meet the 90 percent required for a rating of substantial conformity. Cases in Marion County were more likely to be rated as having substantially achieved this outcome (92%) than were cases in Greenville County (74%) or Lexington County (50%).

Although reviewers determined that in many cases DSS was effective in providing services to maintain children safely in their homes and in reducing the risk of harm to children, there was a substantial number of cases in which reviewers determined that DSS had not made sufficient efforts to ensure the safety of children, particularly when they remained in their homes. A key concern identified in these cases pertained to a lack of adequate assessment of the underlying problems in the family, which in turn resulted in a lack of provision of the services necessary to address the risk of harm to children and ensure children's safety.

### **Permanency Outcome 1: Children have permanency and stability in their living situations.**

There are 6 indicators incorporated in the assessment of permanency outcome 1, although not all of them are relevant for all children. The indicators pertain to the agency's effectiveness in preventing foster care re-entry (item 5), ensuring placement stability for children in foster care (item 6), and establishing appropriate permanency goals for children in foster care in a timely manner (item 7).

Depending on the child's permanency goal, the remaining indicators focus on the agency's efforts to achieve permanency goals (such as reunification, guardianship, adoption, and permanent placement with relatives) in a timely manner (items 8 and 9), or whether the agency is effective in ensuring that children who have other planned living arrangements are in stable placements and adequately prepared for eventual independent living (item 10).

South Carolina did not achieve substantial conformity with Permanency Outcome 1. This determination was based on the following findings:

- The outcome was substantially achieved in 40.0 percent of the cases, which is less than the 90 percent required for an overall rating of substantial conformity;
- The State Data Profile indicates that for Federal fiscal year (FFY) 2001, the State did not meet the national standards for (1) the length of time to achieve adoption, and (2) the percentage of children in foster care for 12 months or less who experienced no more than 2 placements.

The State did meet the national standards for the percentage of children in FFY 2001 who (1) were reunified within 12 months of entry into foster care and (2) re-entered foster care within 12 months of a prior foster care episode.

With respect to permanency outcome 1, the CFSR case reviews found that DSS is usually effective in preventing re-entry into foster care (item 5) and providing appropriate services to youth who are transitioning from foster care to independent living (item 10). However, the CFSR case reviews also found that a substantial percentage of children in foster care do not experience stability in their living arrangements (item 6), and that appropriate permanency goals are not uniformly established in a timely manner (item 7).

Another CFSR case review finding is that in 38 percent of the applicable cases, reviewers determined that DSS had not made concerted efforts to achieve reunification in a timely manner. This finding is not consistent with data reported in the State data profile indicating that the State's percent of reunifications within 12 months of the child's entry into foster care met the national standard for that measure. In addition, case reviewers determined that in 77 percent of the applicable cases, DSS had not made the necessary efforts to achieve adoptions in a timely manner. A primary concern identified for adoption pertained to extensive delays in the agency filing for TPR, as well as court-related delays due to overcrowded court dockets and the granting of continuances for TPR hearings.

### **Permanency Outcome 2. The continuity of family relationships and connections is preserved for children.**

Permanency outcome 2 incorporates six indicators that assess agency performance with regard to (1) placing children in foster care in close proximity to their parents and close relatives (item 11); (2) placing siblings together (item 12); (3) ensuring frequent visitation

between children and their parents and siblings in foster care (item 13); (4) preserving connections of children in foster care with extended family, community, cultural heritage, religion, and schools (item 14); (5) seeking relatives as potential placement resources (item 15); and (6) promoting the relationship between children and their parents while the children are in foster care (item 16).

South Carolina did not achieve substantial conformity with Permanency Outcome 2. This determination was based on the finding that the outcome was rated as substantially achieved in 66.7 percent of the cases, which is less than the 90 percent required for substantial conformity.

The CFSR case reviews found that DSS is highly effective in placing children in close proximity to their parents and/or close relatives and in ensuring that siblings are placed together while in foster care, unless separation is deemed necessary to meet at least one child's needs. However, a key CFSR finding was that DSS is not consistently effective in promoting visitation between children in foster care with their parents or with their siblings in foster care. In addition, case reviewers determined that DSS was not consistent in making concerted efforts to (1) seek relatives as placement resources, (2) preserve children's connections to extended families and to their culture and community, and (3) promote the relationship between children and their parents. The key concerns identified were: (1) DSS does not provide sufficient support for children's relationships with their fathers, either through visitation or through other means of preserving connections; and (2) DSS does not routinely support and facilitate visitation among siblings when siblings are separated while in foster care.

### **Well Being Outcome 1: Families have enhanced capacity to provide for their children's needs.**

Well Being Outcome 1 incorporates four indicators. One pertains to agency efforts to ensure that the service needs of children, parents, and foster parents are assessed and that the necessary services are provided to meet identified needs (item 17). A second indicator assesses agency effectiveness with regard to actively involving parents and children (when appropriate) in the case planning process (item 18). The two remaining indicators examine the frequency and quality of caseworker contacts with the children in their caseloads (item 19) and the children's parents (item 20).

South Carolina did not achieve substantial conformity with Well-Being Outcome 1. This determination was based on the finding that the outcome was rated as substantially achieved in 40.0 percent of the cases reviewed, which is less than the 90 percent required for a determination of substantial conformity. Although achievement of Well-Being Outcome 1 was low in all counties, Marion County cases were more likely to be rated as having substantially achieved this outcome (67%) than Lexington County (36%) or Greenville County (29%) cases.

The CFSR case reviews resulted in ratings of Area Needing Improvement for all of the indicators of Well-Being Outcome 1. Reviewers determined that DSS was not consistent in assessing and addressing the service needs of children and their parents, in involving parents and children in the case planning process, and/or in establishing sufficiently frequent face-to-face contact between caseworkers and the children and parents in their caseloads. However, the case reviews also revealed that DSS was more effective with regard to achieving these indicators in the foster care cases than in the in-home services cases; 60 percent of foster care cases were rated as a Strength for this item compared to 25 percent of in-home services cases.

**Well Being Outcome 2: Children receive appropriate services to meet their educational needs.**

There is only one indicator for well being outcome 2, and that pertains to agency effectiveness in addressing children's educational needs (item 21).

South Carolina did not achieve substantial conformity with Well-Being Outcome 2 based on the finding that 84.2 percent of the cases reviewed were determined to have substantially achieved this outcome, which is less than the 90 percent required for substantial conformity.

The CFSR case reviews found that in most of the applicable cases, DSS was effective in assessing children's educational needs and providing appropriate services to meet those needs. However, in 16 percent of these cases, reviewers determined that the agency had not made concerted efforts to ensure that educational needs were assessed and appropriate services provided.

**Well Being Outcome 3: Children receive adequate services to meet their physical and mental health needs.**

This outcome incorporates two indicators; one assesses agency efforts to meet children's physical health needs (item 22) and the other assesses agency efforts to address children's mental health needs (item 23).

South Carolina did not achieve substantial conformity with Well-Being Outcome 3. This determination was based on the finding that the outcome was rated as substantially achieved in 68.8 percent of the 48 applicable cases, which is less than the 90 percent required for a determination of substantial conformity.

The CFSR case reviews found that DSS was not consistent in its efforts to address children's needs with respect to both physical and mental health. A key concern identified was that although children often were being assessed for service needs, they were not receiving needed medical, dental, and mental health services.

## **II. KEY FINDINGS RELATED TO SYSTEMIC FACTORS**

### **Statewide Information System**

Substantial conformity with the systemic factor of Statewide Information System is determined by whether the State is operating a statewide information system that can identify the status, demographic characteristics, location, and goals for children in foster care.

South Carolina was determined to be in substantial conformity with this systemic factor because information on the status, demographic characteristics, location, and goals for the placement of every child in foster care is readily retrievable from the State's data system—CAPSS.

### **Case Review System**

Five indicators are used to assess the State's performance with regard to the systemic factor of a Case Review System. The indicators examine the development of case plans and parent involvement in that process (item 25), the consistency of 6-month case reviews (item 26) and 12-month permanency hearings (item 27), the implementation of procedures to seek termination of parental rights (TPR) in accordance with the timeframes established in the Adoption and Safe Families Act (ASFA) (item 28), and the notification and inclusion of foster and pre-adoptive parents and relative caregivers in case reviews and hearings (item 29).

South Carolina is not in substantial conformity with the systemic factor of Case Review System. CFSR findings indicate that the State is not consistent in involving parents in the case planning process or in holding permanency hearings for children in foster care in a timely manner. Delays in permanency hearings were attributed in part to the fact that the courts do not take responsibility for tracking permanency hearing requirements, granting of continuances, scheduling problems due to overcrowded court dockets, and an insufficient number of DSS attorneys. Stakeholders also noted that the State is not consistently proceeding with the termination of parental rights in a timely manner and does not routinely provide notification of hearings to foster parents, preadoptive parents and relative caregivers or provide them with an opportunity to have input into the hearings. Despite these concerns, the CFSR did find that DSS is effective in ensuring that there is a process for a review of the status of each child in foster care at least every 6 months.

### **Quality Assurance System**

The State's performance with regard to the systemic factor of Quality Assurance System is based on whether the State has developed standards to ensure the safety and health of children in foster care (item 30) and whether the State is operating a statewide quality

assurance system that evaluates the quality and effectiveness of services and measures program strengths and areas needing improvement (item 31).

South Carolina is in substantial conformity with this systemic factor. The State has developed and implemented standards to ensure the protection of the health and safety of children in foster care and maintains a quality assurance system that evaluates and measures program strengths and areas needing improvement. However, it was noted that although the State has a QA process in place, the counties are only reviewed every 5 years (it used to be every 2 years), which may not be sufficient to ensure timely improvements in performance.

### **Training**

The systemic factor of training incorporates an assessment of the State's new worker training program (item 32), ongoing training efforts for child welfare agency staff (item 33), and training for foster and adoptive parents (item 34).

South Carolina is in substantial conformity with the systemic factor of Training because all Child Protection, Foster Care, Adoption, Managed Treatment Services, and Foster Care Licensing caseworkers must be certified through the Child Welfare Certification Training. Following orientation in the county, and before taking on case management responsibilities, new caseworkers receive three consecutive weeks of basic training through the *Child Welfare Training Academy* and must receive a 75 percent score on a test given after the training. In addition, DSS provides 14 hours preservice training to foster parents and requires foster parents to participate in 14 hours of training annually. However, the State no longer has a requirement that caseworkers must complete a specified number of training hours each year, although a calendar of training opportunities is made available to them.

### **Service Array**

The assessment of the systemic factor of service array addresses three questions: (1) Does the State have in place an array of services that meet the needs of children and families served by the child welfare agency (item 35)? (2) Are these services accessible to families and children throughout the State (item 36)? And (3) Can services be individualized to meet the unique needs of the children and families served by the child welfare agency (item 37)?

South Carolina is not in substantial conformity with the systemic factor of Service Array. The CFSR determined that the services available in the State are not adequate to enable children to remain safely with their parents when reasonable and help children in foster and adoptive placements achieve permanency. In addition, the CFSR found that existing services are not consistently available throughout the State. Key services that were noted to be lacking were substance abuse treatment and quality mental health services.



Despite these concerns, the CFSR also determined that DSS is effective in tailoring services to meet the individual needs of children and families. Stakeholder comments indicted that DSS agencies have access to flexible funds and to programs that permit the individualization of services to meet the unique needs of children and families.

### **Agency Responsiveness to the Community**

The systemic factor of agency responsiveness to the community incorporates the extent of the State's consultation with external stakeholders in developing the Child and Family Services Plan (items 38 and 39), and the extent to which the State coordinates child welfare services with services or benefits of other Federal or federally assisted programs serving the same population (item 40).

South Carolina is in substantial conformity with the systemic factor of Agency Responsiveness to the Community. CFSR findings indicate that there is broad collaboration with other agencies in the development of the goals and objectives for the State's Child and Family Services Plan (CFSP) and that the State collaborates with internal and external partners in the development of the Annual Progress and Services Report for the CFSP. The CFSR also found that DSS services for children and families are coordinated with a range of Federal and federally assisted programs.

### **Foster and Adoptive Parent Licensing, Recruitment, and Retention**

The assessment of this systemic factor focuses on the State's standards for foster homes and child care institutions (items 41 and 42), the State's compliance with Federal requirements for criminal background checks for foster and adoptive parents (item 43), the State's efforts to recruit foster and adoptive parents that reflect the ethnic and racial diversity of foster children (item 44), and the State's activities with regard to using cross-jurisdictional resources to facilitate permanent placements for waiting children (item 45).

South Carolina is in substantial conformity with the systemic factor of Foster and Adoptive Parent Licensing, Recruitment, and Retention. The CFSR found that all foster-family homes and child care institutions are uniformly required to meet the State's licensing and certification standards, and that criminal background checks and reviews of child maltreatment histories are consistently completed for foster families and child care institution staff. However, CFSR findings suggest that, although the State has in place a process for Statewide recruitment of foster and adoptive homes that reflect the needs of children requiring placement, there is no comprehensive plan for diligent recruitment that is implemented in the counties.

**Table 1. CFSR Ratings for Safety and Permanency Outcomes and Items for South Carolina**

<b>Outcomes and Indicators</b>	<b>Outcome Ratings</b>			<b>Item Ratings</b>		
	<i><b>In Substantial Conformity?</b></i>	<i><b>Percent Substantially Achieved*</b></i>	<i><b>Met National Standards?</b></i>	<i><b>Rating**</b></i>	<i><b>Percent Strength</b></i>	<i><b>Met National Standards</b></i>
Safety Outcome 1-Children are first and foremost, protected from abuse and neglect.	Yes	91.8	Yes- All			
Item 1: Timeliness of investigations				Strength	100	
Item 2: Repeat maltreatment				Strength	92	Yes
Safety Outcome 2 – Children are safely maintained in their homes when possible and appropriate.	No	71.4				
Item 3: Services to prevent removal				ANI	70	
Item 4: Risk of harm				ANI	76	
Permanency Outcome 1- Children have permanency and stability in their living situations.	No	40.0	Met 2, did not meet 2			
Item 5: Foster care re-entry				Strength	87.5	Yes
Item 6: Stability of foster care placements				ANI	83	No
Item 7: Permanency goal for child				ANI	73	
Item 8: Reunification, guardianship, placement with relatives				ANI	62	Yes
Item 9: Adoption				ANI	23	No
Item 10: Other planned living arrangement				Strength	100	
Permanency Outcome 2 - The continuity of family relationships and connections is preserved.	No	66.7				
Item 11: Proximity of placement				Strength	100	
Item 12: Placement with siblings				Strength	86	
Item 13: Visiting with parents and siblings in foster care				ANI	57	
Item 14: Preserving connections				ANI	75	
Item 15: Relative placement				ANI	71	
Item 16: Relationship of child in care with parents				ANI	68	

\*90 percent of the applicable cases reviewed must be rated as having substantially achieved the outcome for the State to be in substantial conformity with the outcome.

\*\*Items may be rated as a Strength or an Area Needing Improvement (ANI)

**Table 2. CFSR Ratings for Child and Family Well Being Outcomes and Items for South Carolina**

<b>Outcomes and Indicators</b>	<b>Outcome Ratings</b>		<b>Item Ratings</b>			
	<i><b>In Substantial Conformity?</b></i>	<i><b>Percent Substantially Achieved*</b></i>	<i><b>Met National Standards</b></i>	<i><b>Rating**</b></i>	<i><b>Percent Strength</b></i>	<i><b>Met National Standards</b></i>
Well Being Outcome 1 – Families have enhanced capacity to provide for children's needs.	No	40.0				
Item 17: Needs/services of child, parents, and foster parents				ANI	46	
Item 18: Child/family involvement in case planning				ANI	47	
Item 19: Worker visits with child				ANI	71	
Item 20: Worker visits with parents				ANI	46	
Well Being Outcome 2 – Children receive appropriate services to meet their educational needs.	No	84.2				
Item 21: Educational needs of child				ANI	84.2	
Well Being Outcome 3 – Children receive adequate services to meet their physical and mental health needs.	No	68.8				
Item 22: Physical health of child				ANI	79	
Item 23: Mental health of child				ANI	76	

\*90 percent of the applicable cases reviewed must be rated as having substantially achieved the outcome for the State to be in substantial conformity with the outcome.

\*\*Items may be rated as a Strength or an Area Needing Improvement (ANI)

**Table 3: South Carolina's Performance on the Six Outcome Measures for Which National Standards have been Established (2001 data)**

<b>Outcome Measure</b>	<b>National Standard</b>	<b>South Carolina Data</b>
Of all children who were victims of a substantiated or indicated maltreatment report in the first 6 months of CY 2001, what percent were victims of another substantiated or indicated report within a 6-month period?	6.1% or less	3.4%
Of all children who were in foster care in the first 9 months of CY 2001, what percent experienced maltreatment from foster parents or facility staff members?	0.57% or less	0.51%
Of all children who entered foster care in FY 2001, what percent were re-entering care within 12 months of a prior foster care episode?	8.6% or less	6.6%
Of all children reunified from foster care in FY 2001, what percent were reunified within 12 months of entry into foster care?	76.2% or more	82.1%
Of all children who were adopted from foster care in FY 2001, what percent were adopted within 24 months of their entry into foster care?	32.0% or more	14.0%
Of all children in foster care during FY 2001 for less than 12 months, what percent experienced no more than 2 placement settings?	86.7% or more	76.0%

**Table 4: CFSR Ratings for the Seven Systemic Factors for South Carolina**

<b>Systemic Factors</b>	<b>In Substantial Conformity?*</b>	<b>Rating</b>
<b>IV. Statewide Information System</b>	<b>Yes (3)</b>	
Item 24: System can identify the status, demographic characteristics, location and goals of children in foster care		Strength
<b>V. Case Review System</b>	<b>No (2)</b>	
Item 25: Process for developing a case plan and for joint case planning with parents		ANI
Item 26: Process for 6-month case reviews		Strength
Item 27: Process for 12-month permanency hearings		ANI
Item 28: Process for seeking TPR in accordance with ASFA		ANI
Item 29: Process for notifying caregivers of reviews and hearings and for opportunity for them to be heard		ANI
<b>VI. Quality Assurance System</b>	<b>Yes (3)</b>	
Item 30: Standards to ensure quality services and ensure children's safety and health		Strength
Item 31: Identifiable QA system that evaluates the quality of services and improvements		Strength
<b>VII. Training</b>	<b>Yes (3)</b>	
Item 32: Provision of initial staff training		Strength
Item 33: Provision of ongoing staff training that addresses the necessary skills and knowledge.		ANI
Item 34: Provision of training for caregivers and adoptive parents that addresses the necessary skills and knowledge		Strength
<b>VIII. Service Array</b>	<b>No (2)</b>	
Item 35: Availability of array of critical services		ANI
Item 36: Accessibility of services across all jurisdictions		ANI
Item 37: Ability to individualize services to meet unique needs		Strength
<b>IX. Agency Responsiveness to the Community</b>	<b>Yes (3)</b>	
Item 38: Engages in ongoing consultation with critical stakeholders in developing the CFSP		Strength
Item 39: Develops annual progress reports in consultation with stakeholders		Strength
Item 40: Coordinates services with other Federal programs		Strength
<b>X. Foster and Adoptive Parent Licensing, Recruitment and Retention</b>	<b>Yes (3)</b>	
Item 41: Standards for foster family and child care institutions		Strength
Item 42: Standards are applied equally to all foster family and child care institutions		Strength
Item 43: Conducts necessary criminal background checks		Strength
Item 44: Diligent recruitment of foster and adoptive families that reflect children's racial and ethnic diversity		ANI
Item 45: Uses cross-jurisdictional resources to find placements		Strength

\*Systemic factors are rated on a scale from 1 to 4. A rating of 1 or 2 indicates "Not in Substantial Conformity." A rating of 3 or 4 indicates Substantial Conformity.

\*\* Individual items may be rated either as a Strength or as an Area Needing Improvement (ANI).